

**No. PD-1359-17**

**SANDRA COY BRIGGS,**  
*Appellant-Respondent*

**v.**

**STATE OF TEXAS,**  
*Appellee-Petitioner*

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**IN THE TEXAS COURT**  
COURT OF CRIMINAL APPEALS  
4/23/2018  
DEANA WILLIAMSON, CLERK  
**OF CRIMINAL APPEALS**  
**AUSTIN, TEXAS**

**STATE’S MOTION FOR EXTENSION OF TIME TO FILE BRIEF ON THE MERITS**

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

NOW COMES the State of Texas, by and through Nicholas “Nico” LaHood, Criminal District Attorney of Bexar County, Texas, and the undersigned assistant criminal district attorney, with the filing of this motion asking the Court to extend the time for filing the State’s brief on the merits.

**I. STATEMENT OF THE CASE**

Sandra Briggs was charged by indictment with intoxication manslaughter of a public servant and convicted and sentenced to 45 years confinement on January 2012 under Bexar County cause number 2011-CR-2567. The Thirteenth Court of Appeals reversed her conviction on November 21, 2017 under appellate cause number 13-15-00147-CR. This Court granted the State’s petition for discretionary review on March 21, 2018. The State’s brief on the merits was due on April 20, 2018. The State filed its brief on the merits on April 23, 2018 contemporaneously with this motion. This is the State’s first and only request for an extension.

## II. REASONS FOR THE REQUEST

The State made an incorrect notation on its calendar for the due date of this brief. The State has promptly filed its brief on the merits on April 23, 2018, only one business day after the assigned due date.

## III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Counsel for the State prays the Court grants an extension of time and consider the State's brief on the merits, filed on April 23, 2018, to be timely filed.

Respectfully submitted,

NICHOLAS "NICO" LAHOOD  
*Criminal District Attorney*  
Bexar County Texas

/s/ *Nathan E. Morey*

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NATHAN E. MOREY  
*Assistant Criminal District Attorney*  
State Bar No. 24074756  
101 West Nueva, Seventh Floor  
San Antonio, Texas 78205  
Voice: (210) 335-2734  
Email: [nathan.morey@bexar.org](mailto:nathan.morey@bexar.org)  
*Attorneys for the State of Texas*

**CERTIFICATE OF SERVICE**

I, Nathan E. Morey, certify that a copy of the foregoing brief has been delivered by email to Dayna Jones and the Office of the State Prosecuting Attorney on Monday, April 23, 2018, in accordance with Rules 6.3(a), 9.5(b), and 68.11 of the Texas Rules of Appellate Procedure.

*/s/ Nathan E. Morey*

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NATHAN E. MOREY  
*Assistant Criminal District Attorney*  
State Bar No. 24074756  
101 West Nueva, Seventh Floor  
San Antonio, Texas 78205  
Voice: (210) 335-2734  
Email: [nathan.morey@bexar.org](mailto:nathan.morey@bexar.org)  
*Attorney for the State of Texas*

**cc:** DAYNA JONES

*Attorney at Law*  
State Bar No. 24049450  
Email: [daynaj33@gmail.com](mailto:daynaj33@gmail.com)  
*Attorney for Appellant-Respondent*

STACEY SOULE  
*State Prosecuting Attorney*  
State Bar No. 24031632  
Email: [Stacey.Soule@SPA.texas.gov](mailto:Stacey.Soule@SPA.texas.gov)